



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 6, 1999

MEMORANDUM

9904 394 3595

TO: Robert J. Costa
Assistant Staff Director
Audit Division

THROUGH: James A. Pehrkon
Staff Director

FROM: Kim Bright-Coleman *KB*
Associate General Counsel

SUBJECT: MURs 4395, 4480, and 4669 – Complaint-Generated Enforcement
Matters Involving Clinton/Gore '96 Committees

The Office of General Counsel is preparing a First General Counsel's Report addressing four complaint-generated Matters Under Review ("MUR"s) that involve allegations of violations by the Clinton/Gore '96 Primary Committee, Inc. ("Primary Committee") and the Clinton/Gore '96 General Committee, Inc. ("General Committee") as well as other respondents. A draft of the report is attached; however, please note that this is not a final draft and has not been approved for submission to the Commission.¹ We request that the Audit staff review the draft report for accuracy and consistency with the audit. While we understand that the Audit staff's review of the Committees' records, disclosure reports and other documentation during fieldwork did not

¹ Although the complaints in these matters were filed in 1996, these matters were held in abeyance pending completion of the audits of the Primary Committee, General Committee and the Clinton/Gore '96 General Election Legal and Accounting Compliance Fund ("GELAC"), and were activated on February 10, 1999. The audit reports were approved on June 3, 1999.

reveal any material noncompliance related to the violations alleged in the complaints, we request any information you may have about any non-compliance related to the alleged violations that did not rise to a material level. Moreover, we request the Audit Division's assistance with several issues in three of the matters, as discussed below.

9904 394 3596
MUR 4480 involves allegations of non-qualified campaign expenses related to the Primary Committee's reimbursement payments to consultant Richard Morris for travel and subsistence. We request any information the Audit staff may have concerning the disputed reimbursements which the Primary Committee has not paid to Mr. Morris.

Finally, MUR 4669 involves allegations that the Committees did not properly pay for or report expenditures for travel by Air Force One and other government conveyance. We request any information you may have concerning noncompliance in the Committees' payment or disclosure of expenditures related to government travel. In addition, we request the total amounts paid by the Committees and the Democratic National Committee for travel by government conveyance, the amounts that were counted against the primary and general overall expenditure limitations for these kinds of expenditures, and the total amounts reported by the Committees and the Democratic National Committee for travel by government conveyance.

We appreciate your assistance with this matter. If you have any questions or need any additional information, please contact Delanie DeWitt Painter, at extension 1650.

Attachment

Draft First General Counsel's Report